

Milbank

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May 31, 2022

VIA FEDERAL EXPRESS

The Honorable William F. Kuntz, II
United States District Court Judge
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Plaintiffs #1-21 v. County of Suffolk, et al.*, Case No. 15-cv-2431 (E.D.N.Y.)

Dear Judge Kuntz:

We, along with LatinoJustice PRLDEF, represent Plaintiffs in the above-captioned action. Pursuant to Rules II.C. and III.G.1. of the Court's Individual Motion Practices and Rules, Plaintiffs hereby furnish the Court with a full set of courtesy copies of the following motion papers, originals of which were filed as ECF Nos. 356-357, 360-364, 366-369, in connection with Plaintiffs' Motions *in Limine* and *Daubert* Motion:

1. Plaintiffs' Notice of Motion to Exclude Evidence and Argument Regarding Plaintiffs' Immigration Status; Proposed Order Granting Plaintiffs' Motion *in Limine* to Exclude Evidence and Argument Regarding Plaintiffs' Immigration Status; and Certificate of Service [ECF No. 356];
2. Memorandum of Law in Support of Plaintiffs' Motion *in Limine* to Exclude Evidence and Argument Regarding Plaintiffs' Immigration Status [ECF No. 357];
3. Plaintiffs' Notice of Motion to Exclude the Testimony of Joseph Carroll, Melisa Bliss, and Unidentified Witnesses; Proposed Order Granting Plaintiffs' Motion *in Limine* to Exclude Testimony of Joseph Carroll, Melisa Bliss, and Unidentified Witnesses; and Certificate of Service [ECF No. 360];
4. Memorandum of Law in Support of Plaintiffs' Motion *in Limine* to Exclude the Testimony of Joseph Carroll, Melisa Bliss, and Unidentified Witnesses [ECF No. 361];

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5. Declaration of Katherine Kelly Fell, and Exhibits A-D, attached thereto [ECF No. 362];
6. Plaintiffs' Notice of Motion to Exclude the Proposed Expert Opinions of Gregory J. Anderson; Proposed Order Granting Plaintiffs' Motion to Exclude the Proposed Expert Opinions of Gregory J. Anderson; and Certificate of Service [ECF No. 363];
7. Memorandum of Law in Support of Plaintiffs' Motion to Exclude the Proposed Expert Opinions of Gregory J. Anderson [ECF No. 364];
8. Declaration of Samantha Lovin, and Exhibits A-D, attached thereto [ECF No. 366];
9. Plaintiffs' Notice of Motion to Exclude Evidence and Argument Regarding Plaintiffs' Prior Police Interactions; Proposed Order Granting Plaintiffs' Motion *in Limine* to Exclude Evidence and Argument Regarding Plaintiffs' Prior Police Interactions; and Certificate of Service [ECF No. 367];
10. Memorandum of Law in Support of Plaintiffs' Motion *in Limine* to Exclude Evidence and Argument Regarding Plaintiffs' Prior Police Interactions [ECF No. 368];
11. Declaration of Andrew Case, and Exhibits A-L, attached thereto [ECF No. 369].¹

Very truly yours,

/s/ Katherine Kelly Fell
Katherine Kelly Fell

Encls.

cc: Scott Greene (via FedEx, with encls.)
Brian Mitchell, Esq. (via email to Brian.Mitchell@suffolkcountyny.gov, without encls.)
Jose Perez, Esq. (via email to jperez@latinojustice.org, without encls.)
Hon. Lois Bloom (via FedEx, without encls.)

¹ Plaintiffs filed a Notice of Motion and Motion for Leave to File Under Seal Exhibits A-L to Plaintiffs' Motion *in Limine* to Exclude Evidence and Argument Regarding Plaintiffs' Prior Police Interactions, dated May 27, 2022 [ECF No. 370], because these Exhibits contain information that has been designated Confidential by a party pursuant to the Stipulated Second Amended Protective Order [ECF No. 220].